



Samuel Abloeser<sup>†</sup>  
Alan H. Sklarsky<sup>†</sup>  
Of Counsel

March 13, 2025

Christine Abatemarco<sup>‡</sup>  
David M. Cedar<sup>††</sup>  
Beth G. Cole<sup>†</sup>  
Ari Goldberger<sup>††</sup>  
Dylan T. Hastings<sup>††</sup>  
Kevin Haverly<sup>††a</sup>  
Christopher Markos<sup>††</sup>  
Gerald J. Williams<sup>††a</sup>

<sup>†</sup>Member, Pennsylvania Bar  
<sup>†</sup>Member, New Jersey Bar  
<sup>a</sup>Member, New York Bar

Hon. Karoline Mehalchick, U.S.D.J.  
William J. Nealon Federal Bldg. & U.S. Courthouse  
235 N. Washington Avenue  
Scranton, PA 18503  
Via ECF

Re: Carter v. Dauphin County, et al (23-1867)

Your Honor,

I represent Plaintiff in the above-captioned matter. I am writing to follow up on the request made orally and jointly during the March 4 discovery conference, wherein counsel for all parties requested an extension of the deadlines for fact discovery, expert discovery, and dispositive motions by 60 days. The current discovery end date is March 17. The Order entered today did not address the extension request. If a formal motion must be filed, please advise and I will file on promptly. The current and proposed new dates are set forth below.

**Fact Discovery**

Current: March 17, 2025

New: May 19, 2025

**Plaintiff Expert Report**

Current: April 17, 2025

New: June 16, 2025

**Defendant Expert Report**

Current: May 19, 2025

New: July 18, 2025



*\*Certified by the Supreme Court of  
New Jersey as a Civil Trial Attorney*

○ One South Broad Street, Suite 1510  
Philadelphia, PA 19107  
215.557.0099

[www.williamscedar.com](http://www.williamscedar.com)



○ 8 Kings Highway West, Suite B  
Haddonfield, NJ 08033  
856.470.9777

Supplemental Reports

Current: June 9, 2025

New: August 8, 2025

Dispositive Motions

Current: August 6, 2025

New: October 6, 2025

Very respectfully,

/s/ CHRISTOPHER MARKOS

Christopher Markos

*Attorney for Plaintiff*

CC: All counsel (via ECF)